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October 21, 2024

**Doyle v. Gentile, No. 1:21-cv-08528-LTS-OTW**

Dear Judge Wang:

We write on behalf of Counterclaim Plaintiff, Kevin Doyle, in regard to the Court's Order to Show Cause dated October 3, 2024 (the "Order"). In the Order, the Court ordered Counterclaim Defendants Christopher Gentile and Juan Antonio Crawford to "show cause in writing, filed on the docket, by Friday, October 11, 2024, why monetary and/or equitable sanctions, including a recommendation of entry of default, should not be ordered for Counterclaim Defendants failure to comply with ECF 98." (Order at 2 (emphasis omitted)). Ten days have now elapsed since this deadline, and Counterclaim Defendants have not filed a response to the Order.

Mr. Doyle therefore respectfully requests that the Court order Grant & Eisenhofer to produce the documents in their possession by no later than Monday, October 28, 2024. (10/03/2024 Hearing Tr. 7:19-25 ("[M]y order for [Grant & Eisenhofer] is to keep the documents. Keep them in escrow. What I am likely to do is issue a very strong order, if not, an order to show cause. And if the compliance is not achieved by Mr. Crawford and Mr. Gentile, I will direct that, as the first level of sanctions, that all of those documents get produced to Mr. Doyle without any need for review or anything else.").)

Mr. Doyle also respectfully requests leave to submit a motion: (1) requesting a default judgment; and (2) submitting evidence in support of his prayer for statutory damages and injunctive relief. Mr. Doyle proposes the following briefing schedule:

- **Mr. Doyle's Motion:** November 8, 2024
- **Counterclaim Defendants' Response:** November 22, 2024
- **Hearing:** at the Court's convenience.

We thank the Court for its attention to this matter.

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Respectfully,

*/s/ Hannah Dwyer*

Hannah Dwyer

The Honorable Ona T. Wang  
United States District Court for the Southern District of New York  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl St., Room 20D  
New York, NY 10007

VIA CM/ECF

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VIA EMAIL AND FIRST CLASS MAIL TO LAST KNOWN ADDRESS

**CERTIFICATE OF SERVICE**

I hereby certify that on October 21, 2024, I caused a true and correct copy of the foregoing October 21, 2024 letter to Judge Ona T. Wang to be served: (1) on Juan Antonio Crawford via electronic mail at iamjantonio@gmail.com; and (2) on Christopher Gentile via electronic mail at chrisgunome@gmail.com and first class mail at his last known address, 1408 Madison Avenue, #4, New York, NY 10019.

Dated: October 21, 2024

*/s/ Hannah Dwyer*

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Hannah Dwyer